

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

INTELLECTUAL VENTURES I, LLC;  
INTELLECTUAL VENTURES II, LLC,

Plaintiffs,

v.

C.A. No. 1:16-cv-10860-PBS

LENOVO GROUP LTD., LENOVO  
(UNITED STATES) INC., LENOVOEMC  
PRODUCTS USA, LLC, and EMC  
CORPORATION

Defendants.

STIPULATION OF DISMISSAL OF COUNT III OF  
PLAINTIFFS' COMPLAINT AGAINST LENOVOEMC

Plaintiffs INTELLECTUAL VENTURES I, LLC; INTELLECTUAL VENTURES II, LLC ("IV") and Defendant LENOVOEMC PRODUCTS USA, LLC ("LenovoEMC"), pursuant to the provisions of Fed. R. Civ. P. 41(a)(1)(ii), hereby stipulate as follows:

1. IV dismisses Count III in the above-captioned action with prejudice as against LenovoEMC. Each party will bear its own respective costs and attorneys' fees.

/

/

/

/

/

/

/

/

2. The parties agree that nothing in this stipulation will have any bearing on any claim against any other defendant in this action.

Respectfully submitted,

January 9, 2020

INTELLECTUAL VENTURES I, LLC; and  
INTELLECTUAL VENTURES II, LLC,

By its attorneys,

/s/ Brian D. Ledahl

David S. Godkin (BBO #196530)  
James E. Kruzer (BBO #670827)  
BIRNBAUM & GODKIN, LLP  
280 Summer Street  
Boston, MA 02210  
Telephone: 617-307-6100

Brian D. Ledahl (CA SB No. 186579)  
RUSS AUGUST & KABAT  
12424 Wilshire Boulevard 12th Floor  
Los Angeles, California 90025  
Telephone: 310-826-7474  
Facsimile: 310-826-6991  
bledahl@raklaw.com  
achatterjee@raklaw.com

*Attorneys for Plaintiffs  
Intellectual Ventures I, LLC and  
Intellectual Ventures II, LLC*

Respectfully submitted,

January 9, 2020

LENOVOEMC PRODUCTS USA, LLC,

By its attorneys,

/s/ David A. Simons (w/ permission)

Christopher Centurelli (BBO #640974)  
David A. Simons (BBO #638740)  
K&L Gates LLP  
State Street Financial Center  
One Lincoln Street  
Boston, MA 02111  
Telephone: 617-261-3100  
Facsimile: 617-261-3175  
christopher.centurelli@klgates.com  
david.simons@klgates.com

*Attorneys for Defendants  
Lenovo United States) Inc. and  
LenovoEMC Products USA, LLC*

## **CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (“NEF”) on January 9, 2020.

/s/ Brian D. Ledahl  
Brian D. Ledahl